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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TRUSTEES OF THE OPERATING
ENGINEERS PENSION TRUST; TRUSTEES
OF THE OPERATING ENGINEERS
HEALTH AND WELFARE FUND;
TRUSTEES OF THE OPERATING
ENGINEERS JOURNEYMAN AND
APPRENTICE TRAINING TRUST; and
TRUSTEES OF THE OPERATING
ENGINEERS VACATION-HOLIDAY
SAVINGS TRUST,

Plaintiffs,

vs.

LAND SURVEY TECHNOLOGIES INC., a
Nevada corporation; and ANTONIO
BARAJAS, an individual; BARAJAS &
ASSOCIATES, INC., a Nevada corporation;
THE BARAJAS GROUP, a Nevada
corporation; ADRIAN BARAJAS, an
individual; and THE GUARANTEE
COMPANY OF NORTH AMERICA USA, a
Michigan corporation,

Defendants.

CASE NO.:2:13-cv-01403-JAD-NJK

**STIPULATION AND REQUEST TO
EXTEND TIME FOR PLAINTIFFS'
RESPONSE TO DEFENDANTS' MOTIONS
TO SET ASIDE AND REQUEST TO
EXTEND DATE FOR HEARING ON
MOTIONS TO SET ASIDE AND MOTION
FOR DEFAULT JUDGMENT**

[FIRST REQUEST]

Plaintiffs, TRUSTEES OF THE OPERATING ENGINEERS PENSION TRUST; TRUSTEES
OF THE OPERATING ENGINEERS HEALTH AND WELFARE FUND; TRUSTEES OF THE
OPERATING ENGINEERS JOURNEYMAN AND APPRENTICE TRAINING TRUST; and

1 TRUSTEES OF THE OPERATING ENGINEERS VACATION-HOLIDAY SAVINGS TRUST, by and
2 through their counsel of record, Laquer, Urban Clifford & Hodge, LLP, and Defendants, LAND
3 SURVEY TECHNOLOGIES INC., a Nevada corporation; ANTONIO BARAJAS, an individual; and
4 BARAJAS & ASSOCIATES, INC., a Nevada corporation; by and through their counsel of record
5 Jeffrey Hulet, Esq., and THE BARAJAS GROUP, a Nevada corporation; and ADRIAN BARAJAS, an
6 individual (hereinafter collectively "Defendants"), by and through their counsel of record, Lee Iglody,
7 Esq., hereby stipulate and request the Court grant a thirty (30) day extension for Plaintiffs to respond to
8 Defendants' Motions to Set Aside and that the Court set out at least thirty days from its currently
9 scheduled date the hearing on Motions to Set Aside and Plaintiffs' Motion for Default Judgment.

10 On August 5, 2016, the Defendants filed the first Motion to Set Aside. (ECF No. 37). Under this
11 Court's Rules, the Plaintiffs' Response to the Motion to Set Aside is currently due on August 22, 2016.
12 On August 11, 2016, via Minute Order, the Court set the Motions to Set Aside and the currently pending
13 Motion for Default Judgment filed by Plaintiffs for hearing on September 12, 2016.

14 Since the filing of the Motions to Set Aside, attorneys for all of the parties have been in frequent
15 communication with each other concerning this matter. The parties have been discussing potential
16 settlement and resolution of this matter, which would obviate the need for Court resolution of this
17 matter. There is a currently pending settlement proposal that is being discussed amongst the parties. If
18 this proposal is accepted, it will resolve all pending issues in this case and moot all of the motions
19 currently pending. For this reason, the parties request an additional thirty (30) days to allow them to
20 attempt to reach full resolution. It is believed in good faith that the parties will be able to reach a full
21 resolution during the extension of time.

22 The Plaintiffs and Defendants respectfully request the Court extend the time for Plaintiffs'
23 Response to Defendants' Motions to Set Aside from August 22, 2016 until September 21, 2016. The
24 parties also request the Court reset the hearing on the Defendants' Motions to Set Aside and the
25 Plaintiffs' Motion for Default Judgment currently set for September 12, 2016 to a date at least thirty (30)
26 days after September 12, 2016.

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1 There have been no previous stipulations or motions by the parties for extension of these
2 deadlines in this matter. The undersigned counsel for record of the parties represent that this stipulation
3 is entered into in good faith and is not designed for purposes of delay.

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6 DATED: August 19, 2016

LAQUER, URBAN, CLIFFORD & HODGE, LLP

7 /s/ Nathan R. Ring

8 NATHAN R. RING, Nevada State Bar No. 12078
9 4270 S. Decatur Blvd., Suite A-9
Las Vegas, Nevada 89103
Counsel for Plaintiffs

10
11 DATED: August 19, 2016

HOGAN HULET PLLC

12 /s/ Jeffrey Hulet

13 JEFFREY HULET, Nevada State Bar No. 10621
14 7450 Arroyo Crossing Pkwy., Suite 270
Las Vegas, NV 89113
**Counsel for Land Survey Technologies, Barajas &
Associates, Inc., and Antonio Barajas**

15
16 DATED: August 19, 2016

IGLODY LAW

17 /s/ Lee I. Igloody

18 LEE I. IGLODY, Nevada State Bar No. 7757
19 2300 West Sahara Avenue, Suite 1130
Las Vegas, NV 89102
Counsel for The Barajas Group and Adrian Barajas

20
21 IT IS ORDERED the Motion
22 Hearing RE: 34 MOTION for
23 Default Judgment, 37 and 40
24 MOTIONS to Set Aside Default is
reset for 10/17/2016 at 02:00 PM.

IT IS SO ORDERED:

25 
UNITED STATES DISTRICT JUDGE

26 DATED: 8/23/2016
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